

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOHN SOUSA	:	
	:	
vs.	:	CIVIL ACTION NO. 02-4153
	:	
WILLIAM P. JORDAN	:	
and	:	
BEKINS VAN LINES a/k/a	:	
THE BEKINS COMPANY	:	JURY TRIAL DEMANDED

**ANSWER OF BEKINS WORLDWIDE SOLUTIONS, INC.
PLAINTIFF'S COMPLAINT**

Bekins Worldwide Solutions, Inc., misnamed in the complaint as Bekins Van Lines, a/k/a The Bekins Company, by its counsel Daller Greenberg & Dietrich, LLP, makes the following answer with affirmative defenses to plaintiff's complaint.

ANSWER

1. Defendant admits the averments contained in paragraphs 1 and 5 of the complaint.
2. Defendant denies the averments contained in paragraphs 3, 4, 6, 7, 8, 9, 10, 15, 17, 18, 19, 20 and 21 of the complaint.
3. After reasonable investigation, defendant is without knowledge or information sufficient to form a belief as to the truth of the averments contained in paragraphs 2, 11, 12 and 13 of the complaint and, accordingly, denies the same.
4. With respect to paragraphs 14 and 16 of the complaint, defendant incorporates as fully as though set forth at length the answers made herein to the averments contained in these paragraphs of the complaint.

AFFIRMATIVE DEFENSES

5. Plaintiff's complaint fails to state a claim upon which relief can be granted.

6. All claims for relief set forth in the complaint are barred or limited by the Motor Vehicle Financial Responsibility Law, 75 Pa. C.S.A. §1701 *et seq*, or such other statute that may be applicable.

7. No negligent act or omission or commission on the part of answering defendant was the proximate cause of plaintiff's alleged injuries or damages.

WHEREFORE, answering defendant denies that it is liable to any party in any sum or sums and demands judgment in its favor.

DALLER GREENBERG & DIETRICH, LLP

By Morton F. Daller

Morton F. Daller
I.D. No. 02740
7111 Valley Green Road
Fort Washington, PA 19034
215 836-1100

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Answer to Plaintiff's Complaint was served via first class mail upon the following on the date noted:

Counsel for Plaintiff

Peter M. Hileman, Esquire
Suite 15, Bailwick Office Campus
P.O. Box 18901
Doylestown, PA 18901



Morton F. Daller

Date:

8/12/02